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December 10, 2024

**Via Electronic Case Filing**

Honorable Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *TushBaby, Inc. v. Jinjiang Kangbersi Trade Co, Ltd. et al*  
Case No: 1:2024-cv-06150(JMF)

**RE: Request for Leave to File Excess Pages**

Dear Judge Furman:

Glacier Law represents Defendant Jinjiang Kangbeisi Trade Co., Ltd. (“Defendant”) in the above-referenced matter. Defendant intends to file a Motion to Dissolve the Preliminary Injunction Order [Dkt. 81]. The Court’s Individual Rule 4.C limits parties to a total of twenty-five pages of memoranda of law in support of motions. We respectfully request a modest increase in this limit to a total thirty-one pages. Counsel for Plaintiff indicated that Plaintiff would object to this request.

The limited relief sought is necessary because the issues are particularly complicated. Here, Plaintiff’s has two asserted trade dresses that needed to be discussed, the Unregistered Trade Dress which consists of the overall design of the Plaintiff’s baby carrier product, and the Registered Trade Dress, federal registered trademark No. 7489071. There are four factors that need to be discussed as to the preliminary injunction order, likelihood of winning, irreparable harm, balance of equities and public interest. Moreover, to fully address the validity of the Unregistered Trade Dress and Registered Trade Dress, Defendant need to discuss the functionality of the trade dresses, and analysis six factors for the secondary meaning of the trade dresses. Defendant further needs to analysis eight factors for the likelihood of confusion. Given the extensive issues needed to be addressed, we require a modest additional page to ensure fully address the arguments that the Preliminary Injunction Order should be dissolved.

Thus, Defendant hereby respectfully moves this Court to grant its motion for leave to file its Motion to Dissolve the Preliminary Injunction Order in a total thirty-one pages.

We thank the Court for its time and attention to this matter and in considering this request.

Respectfully submitted

By: /s/ Wei Wang

Wei Wang

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Cc: Via ECF Counsel of Record